

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

AWILDA IGLESIAS-SOLIS

Civil No.: 3:11-cv-01137-SEC

Plaintiff

v.

Title VII, ADEA, SEPARATION PAY,  
TORTS

IPR PHARMACEUTICALS

Defendant

**REPORT OF PARTIES' PLANNING MEETING**

TO THE HONORABLE COURT:

COME NOW Plaintiff, Awilda Iglesias-Solis ("Iglesias"), and Defendant IPR Pharmaceuticals ("IPR"), by and through the undersigned attorneys, and very respectfully state and pray as follows:

1. On **May 3, 2011**, the parties held a discovery planning meeting pursuant to Fed. R. Civ. P. 26(f).
2. As a result, the parties have agreed on a discovery plan which is hereby submitted to the court.
3. The agreements reached by the parties are the following:
  - a. The parties shall exchange Initial Disclosures on or before **May 10, 2011**.
  - b. The parties shall notify their respective First Set of Interrogatories and Request for Production of Documents on or before **May 10, 2011**. The interrogatories will be limited to twenty-five (25) questions, including its subparts. The parties will have until

**June 10, 2011** to notify the opposing party by messenger their written responses to these discovery requests.

- c. Defendant requested that Plaintiff authorize it to obtain copies of all medical records directly or indirectly related to the claims set forth in the Complaint.
- d. Defendant will submit copies of Authorization to Use and Disclose Protected Health Information for the Plaintiff to sign based on the medical information requested, as required by the privacy Rules promulgated under the Health Insurance Portability and Accountability Act (“HIPAA”) on or before **May 10, 2011**. Plaintiff will return to Defendant the necessary authorizations to use and disclose protected health information duly signed on or before **May 17, 2011**.
- e. As ordered by this Honorable Court, parties shall submit their Joint Discovery Plan (Rule 26 Meeting Report) on or before **May 13, 2011**.
- f. As ordered by this Honorable Court, parties shall submit their Joint Case Management Memorandum on or before **May 13, 2011**.
- g. Plaintiff will notify the use of any expert witnesses on or before **May 13, 2011**.
- h. Plaintiff will submit to Defendant the disclosures regarding expert testimony required under Fed. R. Civ. P. 26, including a written report and curriculum vitae of any expert witnesses, on or before **June 13, 2011**.
- i. Defendant will take Plaintiff’s deposition on **July 14, 2011**, beginning at 9:00 a.m. throughout the course of the day, at the offices of McConnell Valdés LLC.
- j. Plaintiff’s deposition will be conducted in Spanish.

k. Each party will cover the costs for translation into English of those portions of Plaintiff's deposition testimony it will use in litigating its case.

l. In addition, Plaintiff must have served Defendant with the written responses to Defendant's First Set of Interrogatories and Request for Production of Documents and Other Tangible Things prior to the taking of Plaintiff's deposition on the date stated above.

m. After Plaintiff's deposition Defendant will have 15 days to serve any additional discovery (interrogatories, request for production of documents and/or notice of deposition to any witness announced by Plaintiff.)

n. Plaintiff will take Leslie Rodriguez' deposition on **July 20, 2011**.

o. Both parties may conduct depositions of the opposing party's witnesses and have reserved **July 21 and/or July, 28, 2011** to do so.

p. Defendant will depose Plaintiff's witnesses at McConnell Valdés.

q. As ordered by this Honorable Court, discovery by all parties shall be completed on or before August 15, 2011. After the discovery deadline, no discovery shall be performed by any of the parties, except that permitted by Fed. R. Civ. P. 26(e).

r. The parties recognize their duty to supplement or correct the disclosures or responses to discovery to include information thereafter acquired or if the party learns that the response is in some material respect incomplete or incorrect.

s. Defendant reserves the right to amend their discovery plan in the event that Plaintiff files an Amended Complaint to include additional claims.

4. As to the production of electronically stored information (“ESI”), Defendant IPR is still evaluating Plaintiff’s proposal as to a discovery protocol for ESI. By **May 18<sup>th</sup>**, IPR will submit its responses and its own proposals to Plaintiff’s attorneys for their consideration and evaluation.

WHEREFORE, the appearing parties respectfully request that this Honorable Court approve the discovery schedule herein proposed by the parties.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 13<sup>th</sup> day of May, 2011.

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